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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
REYES QUINONEZ,  
Defendant.

CASE NO. 1:23-CR-00054-JLT-SKO  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER  
DATE: September 6, 2023  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

This case is set for status conference on September 6, 2023. By this stipulation, defendant now moves to continue the status conference until October 18, 2023, and to exclude time between September 6, 2023, and October 18, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv).

- a) The government represents that discovery in this matter, including officer worn body camera, police reports, and other items have been produced to defense.
- b) Defense counsel has requested some additional items of discovery, some of which the government has obtained and provided, others items the government is working with the investigative agencies to determine whether those items exist and if so to obtain them.
- c) Defense counsel requests the additional time to review the discovery, meet with his client, conduct independent investigation, and pursue a pretrial resolution of the case. The

1 government and defense counsel have been in communications about a pretrial resolution of the  
2 case and need the additional time to continue those discussions.

3 d) Counsel for defendant believes that failure to grant the above-requested  
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
5 into account the exercise of due diligence.

6 e) The government does not object to the continuance.

7 f) Based on the above-stated findings, the ends of justice served by continuing the  
8 case as requested outweigh the interest of the public and the defendant in a trial within the  
9 original date prescribed by the Speedy Trial Act.

10 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
11 et seq., within which trial must commence, the time period of September 6, 2023 to October 18,  
12 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it  
13 results from a continuance granted by the Court at defendant's request on the basis of the Court's  
14 finding that the ends of justice served by taking such action outweigh the best interest of the  
15 public and the defendant in a speedy trial.

16 2. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
18 must commence.

19 IT IS SO STIPULATED.

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21 Dated: August 30, 2023

PHILLIP A. TALBERT  
United States Attorney

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24 /s/ JUSTIN J. GILIO  
25 JUSTIN J. GILIO  
26 Assistant United States Attorney

27 Dated: August 30, 2023

28 /s/ REED GRANTHAM  
29 REED GRANTHAM  
30 Counsel for Defendant  
31 Reyes Quinonez

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6 **ORDER**

7 IT IS SO ORDERED.  
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10 DATED: 9/1/2023  
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*Sheila K. Oberto*

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THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE